

# EXHIBIT D

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF  
THE EXTRADITION OF  
MICHAEL L. TAYLOR

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Case No. 20-mj-1069-DLC

IN THE MATTER OF  
THE EXTRADITION OF  
PETER M. TAYLOR

Case No. 20-mj-1070-DLC

**DECLARATION OF DANIELLE BOOMHOWER**

In accordance with the provisions of 28 U.S.C. § 1746, I, the undersigned Danielle Boomhower, do hereby make the following declaration pertinent to the above-captioned cases.

1. I, Danielle Boomhower, am the Assistant Deputy Superintendent of the Norfolk County Sheriff's Office, which oversees the Norfolk County Correctional Facility ("Norfolk"), and am familiar with the policies and procedures in place to address the COVID-19 pandemic within that facility.
2. Michael and Peter Taylor are both currently detained at Norfolk.

*COVID-19 Mitigation Efforts*

3. Staff, correctional officers, and administrators at Norfolk have taken the following steps to mitigate the spread of COVID-19 to and among the prison population and to properly treat any detainee should they fall ill:
  - a. Adopting enhanced inmate intake procedures, including scrutiny of travel and exposure to illness. All new inmates and detainees are initially placed in an orientation unit, in which they are quarantined for 14 days prior to being classified and assigned to the general population;

- b. Adopting treatment and detection practices consistent with guidelines issued by the Center for Disease Control (“CDC”) and the Department of Public Health (“DPH”);
  - c. Suspending family and friend visits;
  - d. Restricting attorney visits to non-contact, behind glass visits, and instituting mandatory temperature checks for all attorneys entering the non-contact visiting area;
  - e. Restricting non-security and non-essential staff from entering the facility;
  - f. Requiring all staff to wear masks and submit to regular temperature checks;
  - g. Requiring all inmates to wear masks;
  - h. Arranging for court hearings to be conducted by videoconference and telephone to limit inmate travel outside of the facility and resulting possible exposure;
  - i. Maintaining an aggressive (3x daily) cleaning schedule for the housing units; and
  - j. Educating staff and inmates on proper social distancing and sanitation practices.
4. Norfolk is currently below maximum capacity for detainees which has afforded the facility flexibility in making housing assignments and allowed for greater social distancing between inmates.
5. Medical staff are equipped to treat inmates who have medical conditions that are associated with increased risk of complications from COVID-19.

*Further Mitigation Efforts Addressing Specific COVID-19 Cases at Norfolk*


6. The following is a timeline and explanation of Norfolk staff's efforts to contain and isolate the disease after staff and detainees tested positive for COVID-19.
7. On April 3, 2020, one staff member tested positive. That staff member has not worked at the institution since March 19, 2020 and first showed symptoms on March 22, 2020.
8. On April 23, 2020, Norfolk reported one COVID-19 positive result for a county inmate. The inmate was a new arrest that came into the facility on April 20, 2020. Per protocol, any new detainee resulting from a new arrest is quarantined. The detainee was assessed in the sally port area. He exhibited a symptom and was brought to the medical area and immediately put into isolation. He has been quarantined and isolated since April 20, 2020.
9. On April 24, 2020, Norfolk learned that a correction officer tested positive for COVID-19. The correction officer was last in the facility on April 21, 2020.
10. On May 26, 2020, a county inmate tested positive for COVID-19. On May 25, 2020 this inmate was housed in the general population in housing unit 1B and immediately notified medical staff that he was not feeling well. He was removed from the housing unit and isolated in Medical. After a discussion with the Department of Public Health and our Infectious Disease Doctor, the entire housing unit of 45 men, which includes county inmates as well as United States Marshals Service ("USMS") detainees were offered tests. This unit remained quarantined until the results were received.
11. On May 28, 2020, Norfolk staff tested 43 inmates in housing unit 1B. Two inmates refused tests. Out of those 43 tests, seven inmates tested positive, and one of those inmates was released from Norfolk. The unit will remain isolated and quarantined until further notice.

All staff will continue to wear KN95 or surgical masks and gloves and all inmates/detainees will wear KN95 or surgical masks when they are out of their cells. Due to the declining prison population, all offenders in this unit had been housed in single cells prior to these positive test results. The unit is sanitized before each recreation period and from the hours of 10:00 p.m. to 9:00 a.m.

12. On May 30, 2020, one correction officer tested positive for COVID-19. The correction officer was last in the facility on May 29, 2020.
13. On June 4, 2020 , four inmates from housing unit 1B who were first tested on May 28, 2020, as part of the original 43 inmates/detainees, and who originally tested negative, began showing symptoms and were retested. Two inmates tested positive and two tested negative. The inmates will remain on isolation status.
14. On June 5, 2020, a county inmate from housing unit 1B that had previously tested negative was hospitalized and reported positive on June 6, 2020. He reported to staff during temperature checks that he was having symptoms.
15. On June 8, 2020, 30 inmates from unit 1B who originally tested negative were retested per the recommendation of the Infectious Disease Doctor. 17 inmates tested positive (five USMS detainees and 12 County prisoners). All of these new cases stemmed from the same housing unit (1B) where the previous cases originated from. The unit has been quarantined and isolated since the first positive case on May 25, 2020. The Norfolk medical staff physically enters that housing unit four times per day to conduct the distribution of medication, collect sick call slips, and take temperatures and oxygen levels for all of the inmates/detainees quarantined in the unit. If a physician determines that a detainee needs

- additional care outside the scope of Norfolk's capabilities, then the inmate is transported to an outside hospital, which was the case with the hospitalized inmate on June 5, 2020.
16. On June 10, 2020, a county inmate in housing unit 2A informed the medical staff about his allergies. As a precaution, he was tested for COVID-19. He was also isolated and quarantined in the medical unit. On June 11, 2020, the test results came back positive.
17. On June 11, 2020, the Infectious Disease Doctor recommended that the entire population of housing unit 2A be tested. The unit remained quarantined and isolated pending the test results. There were 34 tests administered and two positive tests were reported on June 12, 2020. Those two inmates were brought to the medical unit for monitoring and isolation.
18. On June 12, 2020, Norfolk was informed that a corrections officer had tested positive for COVID-19. The officer was last present at the facility on June 11, 2020.
19. Norfolk has an Infectious Disease Doctor on staff and continues to consult with the Massachusetts Department of Public Health and follow the CDC guidelines.
20. Neither Michael nor Peter Taylor are assigned to housing units 1B or 2A and there are no positive cases of COVID-19 in their assigned housing units.
21. This affidavit is made to the best of my knowledge, information, and belief.

Executed this 15<sup>th</sup> day of June, 2020

  
DANIELLE BOOMHOWER  
Assistant Deputy Superintendent  
Norfolk County Correctional Facility